

# Exhibit 2

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA E-MAIL**

May 9, 2022

Steven T. Cottreau, Esq.  
Gabrielle Pritsker, Esq.  
Jones Day  
51 Louisiana Ave., N.W.  
Washington, D.C. 20001-2113

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Steve:

Further to our recent discussions, we write to request that Dubai Islamic Bank ("DIB") undertake targeted supplemental searches for relevant documents, in light of the new evidence released by the Central Intelligence Agency ("CIA").

As you know, plaintiffs sought discovery from the United States government concerning DIB's relationship with Osama bin Laden and al Qaeda, but the relevant agencies (including the CIA) refused to produce the responsive records. As a result, plaintiffs did not have the benefit of the evidence in the possession of the CIA when conducting discovery of DIB. However, pursuant to President Biden's mandate in Executive Order 14040, both the CIA and FBI conducted reviews of certain documents previously withheld in discovery, and released previously classified evidence pertaining to DIB.

The evidence recently produced by the CIA provides new and specific evidence concerning the relationship between DIB and Osama bin Laden and al Qaeda, including evidence concerning particular financial vehicles that were used by the bank to support al Qaeda. The CIA reports also confirm the direct involvement of DIB Chairman Saeed Ahmed Lootah in DIB's support for bin Laden and al Qaeda. Given this new information, DIB is under an obligation to conduct supplemental searches for certain relevant documents.

In particular, plaintiffs request that DIB undertake immediate steps to conduct the following targeted searches, in accordance with its basic discovery obligations:

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1. Records concerning any letters of credit in favor of Osama bin Laden, bin Laden's Sudanese businesses, Saidi Madani al Tayyib (and any business associated with him), and/or Abu Khalifa al Omani (and any business associated with him). According to the CIA, Osama bin Laden, his Sudan-based companies, and al Qaeda's financial officers secured letters of credit from DIB. CIA 000045. DIB Chairman Saeed Ahmed Lootah personally authorized, stamped, and signed at least certain of those letters of credit. CIA 00326, 426. In light of the new evidence from the CIA, plaintiffs request that DIB undertake searches of relevant repositories where DIB reasonably may expect that records relating to letters of credit (or similar financial instruments) in favor of, or for the benefit of, bin Laden, any of his Sudanese companies (as identified in the attached list), or al Qaeda financial officers Saidi Madani al Tayyib or Abu Khalifa al Omani (including any associated companies) may be located. Given Saeed Ahmed Lootah's direct involvement in these arrangements, these searches should include repositories housing the business records and work papers of Saeed Ahmed Lootah.
2. Records concerning cooperation between DIB Chairman Saeed Ahmed Lootah and/or his businesses and Osama bin Laden's companies. According to the CIA's newly declassified intelligence reports, Saeed Ahmed Lootah and his businesses worked with a UAE-based company managed by al Qaeda and further "cooperate[d] with Bin Laden's companies." CIA 00426. In light of this new evidence, plaintiffs request that DIB conduct searches of any relevant electronic databases for information concerning any DIB account for any business entity Saeed Ahmed Lootah owned or controlled directly or indirectly, including but not limited to, the Saeed Ahmed Lootah Trading Establishment (a/k/a S.S. Lootah Contracting Company), Saeed Ahmed Lootah & Sons Group (a/k/a S.S. Lootah Group), and S.S. Lootah International. For any such account, plaintiffs request that DIB produce all available account and transaction information.
3. Records concerning DIB's relationship with Hisham Ihsan Koprulu. The CIA's declassified intelligence reports also indicate that "[Saeed] Lootah and DIB have alleged ties to other Dubai-based individuals and firms that maintain financial links to Bin Laden," including "Hisham Ihsan Koprulu, the General Manager of Koprulu Trading Company in Dubai, [who] is a DIB customer who has had regular business and financial dealings with Bin Laden, his Al-Hijra company, and Islamic Army members." CIA 000735. In light of this new evidence, plaintiffs request that DIB conduct searches of any relevant electronic databases for information concerning any DIB account or relationship relating to Hisham Ihsan Koprulu or Koprulu Trading Company and produce all available account and transaction information.
4. Records concerning the relationships between Saeed Ahmed Lootah and his businesses and (1) Osama bin Laden and his Sudanese companies; (2) Saidi Madani al Tayyib and companies associated with him; (3) Hassan al Turabi and the National Islamic Front ("NIF"); (4) Hisham Ihsan Koprulu and his companies; and (5) Abu Khalifa al Omani and companies associated with him. In light of the new evidence

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- concerning the direct involvement of Saeed Ahmed Lootah in DIB's support for al Qaeda, and his personal ties to Osama bin Laden, Hassan al Turabi, Hisham Ihsan Koprulu, and others, *see e.g.*, CIA 00045, 322, 326, 337, 426, 722, 734-36, DIB now knows that repositories housing the business records and work papers of Saeed Ahmed Lootah at DIB are likely to hold highly relevant records concerning those activities and relationships. Plaintiffs therefore request that DIB undertake searches of those files for any documents concerning Osama bin Laden and his Sudanese companies; Saidi Madani al Tayyib and any associated companies; Hasan al Turabi and the NIF; Hisham Ihsan Koprulu and his companies; and Abu Khalifa al Omani and any companies associated with him (including the Jabal Ali, UAE company referenced in the CIA reports).
5. Records concerning DIB Board Member Sheikh Yousif Jassim al Haji. The CIA reporting indicates that a "principal connection [between Lootah/DIB and radical NGOs] probably is through DIB Board Member Sheikh Yousif Al Haji." Plaintiffs request that DIB search for and produce documents concerning al Haji's recruitment and joinder to the Board, documents sufficient to show the duration of his tenure and the reasons for his departure, and documents concerning any involvement by al Haji in DIB's zakat contributions.

Please advise whether DIB will undertake the limited and targeted searches requested above.

Sincerely,

COZEN O'CONNOR

By: /s/ Sean P. Carter

Sean P. Carter

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*On behalf of the Plaintiffs' Exec. Committees*

*On behalf of the Plaintiffs' Exec. Committees*

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By: /s/ Jerry S. Goldman  
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*On behalf of the Plaintiffs' Exec. Committees*

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**ATTACHMENT**

**OSAMA BIN LADEN'S SUDANESE COMPANIES**

1. Wadi al Aqiq Company, Ltd. (a/k/a “The Mother Company”)
2. Al Hijrah Construction and Development, Ltd.
3. Taba Investment Company, Ltd. (a/k/a Taba Investments)
4. Al Timar al Mubarikah (a/k/a Al Themar al Mubaraka)
5. Gum Arabic Company
6. Bin Ladin International
7. Al Qudarat Transport Company (a/k/a Al Qudarat Transportation)
8. Blessed Fruits Company
9. Khartoum Tannery